

Modoc County proposes this work plan to provide for the proper, safe, and efficient use of pesticides essential for the production agriculture within Modoc County while also protecting the environment from the harmful effects of pesticides and assuring agricultural handlers and workers of safe working conditions where pesticides are used. The current year is to be used to evaluate our existing program and to develop a comprehensive, baseline work plan for the next two years.

Modoc County comprises over four million acres spanning over 60 miles from north to south. The main agricultural production area is in Tulelake, over sixty miles from the office in Alturas. We have two staff (including the Agricultural Commissioner) licensed to conduct pesticide use enforcement activities, both in Alturas. We recently hired two inspectors, neither of which possesses licenses in either of the pesticide categories. Temporarily, a retired inspector is working part-time in our Tulelake office. Our inspectors also are responsible for all of the other regulatory programs in agriculture and measurement standards.

Given the existing resources, we must adjust our activities in order to implement an effective PUE program.

Restricted Materials Permitting

Permit Evaluation Process: Modoc County Ag Department has limited resources both in the availability of qualified personnel and in data processing. We will permit agricultural pest control by competent and responsible entities by performing and administering the restricted materials process for qualified permittees. The Modoc County Agricultural Commissioner's office will provide for the certification of private applicators for restricted materials permittees and designated agents, as well as the registration of qualified licensees including pest control advisors, dealers, pilots, and applicators.

Site Monitoring Plan Development: Modoc County will develop a local site-monitoring plan that will utilize our knowledge of pesticide hazards, local conditions, cropping and fieldwork patterns and handler, permittee and applicator compliance histories.

This includes sites identified at issuance or amendments of restricted material permits, notices of intent and complaints received. Priorities for site monitoring inspections include but not limited to: areas where pesticide applications pose a potential risk to people, animals and/or the environment, crops, endangered species and habitat, schools, parks and specific pesticides (Vapam, Telone, Di-Syston, Methyl Bromide).

We will monitor 5% of total sites as required by regulation. High priority will be given to sites that are new to the RMP system, even without a NOI being filed. This will allow us to better use our resources during the busy times of the year.

Compliance Monitoring Priorities

In the past, Modoc County has evaluated past compliance activities in order to develop its future Negotiated Work Plan. We will work with our Enforcement Branch Liaison to assure that our program meets the director's essential program elements. In order to optimize limited staff resources, we will need to reevaluate our compliance monitoring activities (see note below). Our office will consider staff assignments to better utilize staff.

Comprehensive Inspection Plan Development: Past inspections will be evaluated and used to develop a comprehensive inspection plan for FY 2006/07 and subsequent years. Historically, we have conducted inspections on as many applications in the Tulelake area as possible and will continue that practice. We believe the random inspections we have done is adequate to assure compliance on these uses. Given limited insecticide uses in the county and the nature of the insecticides that are used, we will attempt to inspect as many of these applications as possible. In 2005/06 we conducted 45 use monitoring inspection and found no violations.

FY 06/07 GOALS*:

Application Inspections (Non-Fumigation)	15
Field Worker Safety Inspections	2
Mix/Load Inspections (Growers)	4 (2)
Field Fumigation Monitoring Inspections	0
Headquarter/Employee Safety Records Inspections	2
Pest Control Business Record Inspections	1
Pest Control Dealer Record Inspections	1
Agricultural Pest Control Advisor Record Inspections	1
Pre-Application Site Inspections	5% of NOIs

*Note: The above goals have been reduced from previous years to adjust for the current lack of experienced and licensed inspectors. We will further adjust these goals as resources allow.

All noncompliances involving personal protective equipment with employees noted on application, mix/load or fieldworker inspections will be corrected at time of inspection or at a follow up inspection and will trigger a headquarters inspection. Beginning in Fiscal Year 2007/08 we will try to conduct a headquarters inspection on farming operations with employees that handle pesticides that haven't previously held an Operator I.D. or Restricted Material Permit within a year of issuance.

Investigation Response and Reporting Improvement: We will evaluate our investigation response and reports and will implement program improvements. This includes the

timely initiation and completion of non-priority episode investigations. We will begin our investigation of all incidents within 48 hours of receipt with a target of 60 days for completion and submission to DPR.

We will make available to our assigned Enforcement Branch Liaison a log that covers episode investigations not already reported or tracked as a priority episode investigation or pesticide illness. The log will include the following information:

1. County name;
2. Month;
3. Tracking number or file name;
4. Pesticide(s) involved in the episode;
5. Type of episode;
6. Episode location within the county;
7. If violations were found
8. Date investigation was closed.

Priority episode investigation and reporting: We will adhere to the guidelines that DPR has established for priority investigations.

Development and use of investigation plans: We will use DPR's guidance for conducting investigations.

Thorough report preparation: We will submit reports that meet DPR's criteria for completion and will work with our Enforcement Branch Liaison in to ensure complete reports.

Enforcement Response Evaluation

Modoc County is committed to evaluate our enforcement program and assure it is fair, consistent and timely.

We will consider all appropriate enforcement options in our regulatory toolbox. Referral to the state will be considered where appropriate.

We will assure a timely response to prevent lost or compromised evidence and to help tie our action to the violation. Our office will have a target of 60 days for completion of our investigation and taking any enforcement/compliance action within 90 days of completion.

We will respond to all violations with either a compliance or enforcement action as suggested in DPR's Enforcement Guidelines.

We will use the action that will most likely ensure future compliance. Priority will be given to those violations that pose greatest risk to people or the environment.